

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	No. 19-CR-10080
)	
ELIZABETH HENRIQUEZ and)	
MANUEL HENRIQUEZ)	
)	
Defendants)	
)	

**DEFENDANTS ELIZABETH AND MANUEL HENRIQUEZ'S
MOTION TO PERMIT TRANSFER OF PASSPORTS TO THE
PRETRIAL SERVICES OFFICE FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Following Defendants Elizabeth and Manuel Henriquez's initial appearance in the SDNY on March 12, 2019, counsel for Defendants delivered Defendants' passports to the Pretrial Services Office for the District of Massachusetts. At their initial appearance before this Court on April 3, 2019, Defendants were informed that their passports would remain in the custody of the Pretrial Services Office for the District of Massachusetts until disposition of the charges against them. Defendants respectfully request that the Court permit their passports to be transferred to the custody of the Pretrial Services Office for the Northern District of California, the district where they currently reside and have been assigned a Pretrial Services officer.

Defendants have no current intention to travel internationally for any reason until resolution of this case. However, close family members are scheduled to travel internationally in the coming months. Defendants request the transfer of their passports in the unlikely event that there is an emergency relating to a family member abroad that would necessitate Defendants' requesting permission to travel internationally. In the event Defendants' Pretrial Services officer

approves such a request, coordinating the transfer of Defendants' passports across the country would likely take several days, which would be problematic in an emergency scenario.

WHEREFORE, Defendants respectfully request that the Court permit the transfer of Defendants' surrendered passports from the Pretrial Services Office for the District of Massachusetts to the Pretrial Services Office for the Northern District of California. The Pretrial Services Office for the Northern District of California supports this transfer of custody and the Pretrial Services Office for the District of Massachusetts takes no position. Defendants have conferred with the Government, and the Government takes no position on Defendants' motion.

DATED: April 12, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Aaron M. Katz, hereby certify that the foregoing document was served through the ECF system on all registered participants in this action on April 12, 2019.

/s/ Aaron M. Katz
Aaron M. Katz